

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

F.L.B., a minor, by and through his Next Friend,
Casey Trupin; et al.,

Plaintiffs-Petitioners,

v.

Loretta E. LYNCH, Attorney General, United
States; et al.,

Defendants-Respondents,

Case No. 2:14-cv-01026-TSZ

STIPULATION AND PROPOSED
ORDER TO EXTEND CASE
MANAGEMENT DEADLINES

STIP. TO EXTEND DEADLINES
Case No. 2:14-cv-01026-TSZ

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1 The parties, by and through their counsel of record, hereby submit the following
2 Stipulation to Extend Case Management Deadlines. Although the parties are actively and
3 diligently engaged in discovery, good cause exists to extend certain case management deadlines
4 in order to accommodate the parties' discovery schedules. Specifically, the Court has ordered
5 the disclosure of expert testimony by November 2, 2015 – in less than three weeks. Certain of
6 the parties' expert witnesses will be unable to comply with that deadline due to other
7 professional commitments and previously-scheduled travel plans.

8 In addition, the current discovery schedule contemplates that all motions related to
9 discovery must be filed by November 25, 2015, and that discovery must be complete by
10 December 18, 2015. Given that the Court directed Defendants to respond to Plaintiffs' first set
11 of written discovery requests by October 1, 2015, and that the Court stayed Plaintiffs' noticed
12 Rule 30(b)(6) deposition on Defendant DOJ until October 8, 2015, the schedule leaves less than
13 two months for the parties to complete production of discovery, analyze the responses,
14 determine whether motion practice is required, and then prepare any motions. The parties must
15 also amend their pleadings, conduct depositions, and prepare expert witnesses during this time
16 period.

17 The parties acknowledge that the Court's current schedule hews closely to the schedules
18 the parties proposed in their Joint Status Report of May 29, 2015. Dkt. 155 at 8-9. Due to the
19 parties' disputes regarding the appropriate scope of discovery in this case, which were not fully
20 resolved until late August 2015, the parties were unable to conduct discovery during most of
21 the summer. This has further compressed the current case management timetable.

22 In light of the competing professional commitments and travel plans of the expert
23 witnesses, the complexity of this case, and the amount of discovery the parties must undertake
24 in a relatively short time frame, the parties respectfully request a 30-day extension of the expert
25 disclosure date and the subsequent case management deadlines, as described below. The
26

parties' proposed schedule maintains the Court's previously-set dates for pretrial filings and trial, but the parties would be amenable to resetting those dates in order to accommodate the Court's calendar.

Deadline	From	To
Disclosure of expert testimony	November 2, 2015	December 2, 2015
Discovery motions filed by	November 25, 2015	December 23, 2015
Discovery complete by	December 18, 2015	January 22, 2016
Dispositive motions filed by	January 28, 2016	February 25, 2016
All motions in limine filed by	March 31, 2016	March 31, 2016
Pretrial order due	April 18, 2016	April 18, 2016
Trial briefs, et al., due by	April 18, 2016	April 18, 2016
Pretrial conference	April 22, 2016	April 22, 2016
Bench trial	May 2, 2016	May 2, 2016

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

<p>ACLU Immigrants' Rights Project</p> <p>By: <u>s/ Ahilan Arulanantham</u> Ahilan Arulanantham, <i>pro hac vice</i> Cecillia Wang, <i>pro hac vice</i> Stephen Kang, <i>pro hac vice</i></p> <p>Attorneys for Plaintiffs</p>	<p>Northwest Immigrant Rights Project</p> <p>By: <u>s/ Matt Adams (with permission)</u> Matt Adams, WSBA # 28287 Glenda M. Aldana Madrid, WSBA # 46987</p> <p>Attorneys for Plaintiffs</p>
	<p>United States Department of Justice</p> <p>By: <u>s/ William C. Silvis (with permission)</u> William C. Silvis Leon Fresco Nicole Murley</p> <p>Attorneys for Defendants</p>

DATED this 14th day of October, 2015.

[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, and the parties having shown good cause to extend the requested case management deadlines, it is hereby ordered that the case management deadlines are extended as follows:

Deadline	Date
Disclosure of expert testimony	December 2, 2015
Discovery motions filed by	December 23, 2015
Discovery complete by	January 22, 2016
Dispositive motions filed by	February 25, 2016
All motions in limine filed by	March 31, 2016
Pretrial order due	April 18, 2016
Trial briefs, et al., due by	April 18, 2016
Pretrial conference	April 22, 2016
Bench trial	May 2, 2016

All other deadlines remain unchanged.

DATED: _____

Thomas S. Zilly
United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of October, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

By: s/ Ahilan Arulanantham
Ahilan Arulanantham, *pro hac vice*